HAGNER & ZOHLMAN, LLC

Commerce Center 1820 Chapel Ave. West Suite 160 Cherry Hill, New Jersey 08002 (856) 663-9090 Attorney for: Plaintiff

By: Thomas J. Hagner, Esquire

ROBERT S. CONRAD, SR.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Plaintiff,

VS.

CIVIL ACTION NO. 08-cv-5416 (RMB)

THE WACHOVIA GROUP LONG-TERM DISABILITY PLAN;

Defendant.

PLAINTIFF'S NOTICE OF MOTION FOR RECONSIDERATION OF THE DECEMBER 2, 2010 ORDER GRANTING DEFENDANT'S MOTION FOR SUMMARY JUDGMENT AND DENYING PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

TO: Kathleen McLeod Caminiti, Esq. FISHER & PHILLIPS, LLP 430 Mountain Avenue Murray Hill, NJ 07974 Attorneys for Defendants

PLEASE TAKE NOTICE that on a date and time as the Court directs, Plaintiff,
Robert S. Conrad, by his counsel Thomas J. Hagner, Esq., shall move for reconsideration of
the Order entered on December 2, 2010 denying Plaintiff's Motion for Summary Judgment and
granting Defendant's Motion for Summary Judgment. In support of this motion, Plaintiff

adopts the arguments and authority contained in the Brief which is filed in support of this motion.

A proposed form of Order is attached.

HAGNER & ZOHĽMAN, LLC

Attorneys for Plaintiff

Dated: 12/13/10

Thomas J. Hagner, Esq.